

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

Cr. No. H-23-0413

ABIGAIL JO SHRY

UNOPPOSED MOTION TO CONTINUE

Defendant, Abigail Jo Shry, moves this Court for a 90-day continuance of all dates, and he respectfully shows as follows:

Ms. Shry is charged with threat by interstate communication in violation of 18 U.S.C. § 875(c). The pretrial motions deadline was September 25, 2023; the pre-trial conference is set for October 20, 2023, at 10:30 a.m., and jury trial is set for October 30, 2023, at 9:00 a.m.

Counsel has recently received discovery and needs additional time to review and investigate. Undersigned counsel has identified certain legal and factual issues that require further investigation. Counsel needs more time to complete his investigation and analysis, and then to file pretrial motions, if necessary, and to prepare for trial, if necessary. Moreover, additional time is needed to discuss the case with Ms. Shry.

The defendant respectfully submits that the best interests of justice served by granting this motion for a continuance substantially outweigh the interests of the

defendant and the community in a speedy trial, and that failure to grant the continuance would deprive defense counsel of sufficient time to prepare for trial.

The government is unopposed to this motion to continue.

Respectfully submitted,

MARJORIE A. MEYERS
Federal Public Defender
Southern District of Texas No. 3233
Texas State Bar No. 14003750

By /s/ Amr A. Ahmed
AMR A. AHMED
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CERTIFICATE OF CONFERENCE

I certify that I conferred with Assistant United States Attorney Richard Hanes and determined that the United States is unopposed to this motion to continue.

By /s/ Amr A. Ahmed
AMR A. AHMED

CERTIFICATE OF SERVICE

I certify that on October 16, 2023, a copy of the foregoing was served by
Notification of Electronic Filing and will be delivered by email to the office of
Assistant United States Attorney Richard Hanes.

By /s/ Amr A. Ahmed
AMR A. AHMED